

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA, )  
vs. Plaintiff, ) Case No. 4:20-CR-00212  
DEBRA LYNN MERCER-ERWIN (1) )  
Defendants. )

**MOTION TO WITHDRAW AS COUNSEL OF RECORD**

COMES NOW Matthew P. Cyran, counsel for Defendant Debra Lynn Mercer-Erwin herein, and submits his Motion to Withdraw as Counsel of Record and respectfully requests that he be allowed to withdraw from representation of the Defendant for the following reasons:

1. Matthew P. Cyran will be resigning his position with the law firm of White & Weddle, P.C. and relocating.
2. White & Weddle, P.C. will continue to represent Debra Lynn Mercer-Erwin.
3. Debra Lynn Mercer-Erwin has been made aware of counsel's intent to withdraw.
4. Joe E. White, Jr. and Kate C. White have previously entered their appearances on behalf of Debra Lynn Mercer-Erwin and will continue to represent her from this point forward.

5. A proposed Order granting the *Motion to Withdraw* is submitted contemporaneously with the filing of this Motion.

WHEREFORE, Matthew P. Cyran respectfully moves that he be allowed to withdraw as counsel of record for Debra Lynn Mercer-Erwin.

Respectfully submitted,

*s/ Matthew P. Cyran*  
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**CERTIFICATE OF DELIVERY**

I hereby certify that on this 12<sup>th</sup> day of July 2023, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing, which will automatically send e-mail notification of such filing to all attorneys of record.

*s/ Matthew P. Cyran*  
MATTHEW P. CYRAN

**CERTIFICATE OF CONFERENCE**

Pursuant to United States District Court for the Eastern District of Texas Local Rule CR-47(a)(3), on July 12<sup>th</sup>, 2023, Attorney Matthew P. Cyran has conferred with Assistant United States Attorney, Ernest Gonzalez, regarding this motion and can represent to the Court that the United States does not oppose it.

*s/ Matthew P. Cyran*  
MATTHEW P. CYRAN